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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO SEAL PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
SECOND AMENDED MOTION AND
INCORPORATED MEMORANDUM TO
SEAL**

20 Pursuant to LRCiv 5.6(d), Plaintiffs respectfully submit this Motion to Seal
21 Plaintiffs' Opposition to Defendants' Second Amended Motion and Incorporated
22 Memorandum to Seal.

23 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the
24 Court the Plaintiff's Opposition and accompanying Exhibits 1 and 2.

25 Defendants contend that the documents discussed in Plaintiffs' Opposition and
26 documents attached as Exhibits are confidential and should be filed under seal. Plaintiffs
27 do not believe that their Opposition and the disputed documents warrant continued
28 confidential treatment as proprietary or sensitive trade secret information.

1 This dispute notwithstanding, Plaintiffs submit this Motion to Seal Plaintiffs'
2 Opposition to Defendants' Second Amended Motion and Incorporated Memorandum to
3 Seal.

4 RESPECTFULLY SUBMITTED this 18th day of September 2017.

5 GALLAGHER & KENNEDY, P.A.

6 By: /s/ Mark S. O'Connor

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17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on this 18th day of September 2017, I electronically transmitted
19 the attached document to the Clerk's Office using the CM/ECF System for filing and
20 transmittal of a Notice of Electronic Filing.

21 /s/ Deborah Yanazzo